
Subject: State of Emergency Separation of Duties

Effective Date: April 07, 2020

Revised from: New

Policy:

The staff person who determines income eligibility and the staff person that determines nutritional risk cannot be the same person but in the event of limited staff availability, due to a declaration of a State of Emergency and upon waiver authority given by the USDA, a complete certification may be completed by a single CPA.

The complete certification may be completed in person, remotely via phone call or secure interactive video chat.

The State Agency will continue to send weekly emails listing information pertaining to certifications completed by a single individual for your information and to assist with tracking.

Reference: CFR §246.4(a)(26) and Federal Waiver of Separation of Duties-letter dated March 30, 2020.

Procedure(s):

When complete, in-person or remote certifications are conducted by one individual:

1. A Separation of Duties file must be retained at the clinic. The file should include the completed Separation of Duties log.
2. As part of the Management Evaluation, the State Agency staff will conduct a review of 5 or more file reviews for those clients listed on the Separation of Duties log. This review will consist of the following:
 - a) Review of the income documentation, proof of identification and the modified diet questionnaire for remote certifications, as documented in KWIC, to verify that there are no indications of potential fraud or abuse
 - b) Verify the staff person's name on the Separation of Duties Exception Log
 - c) Verify the WIC applicant/client's name and client ID #
3. A telephone call may be made to the participant to validate income and verify participation.